UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re

SKAT TAX REFUND SCHEME LITIGATION

This document relates to: 1:19-cv-01906-LAK, 1:19-cv-01911-LAK, and 1:19-cv-01924-LAK

Master Docket 18-md-02865 (LAK) ECF Case

STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO THE COMPLAINTS

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the parties that the current May 13, 2019 deadline for defendants Michelle Investments Pension Plan, Remece Investments LLC Pension Plan, and Xiphias LLC Pension Plan (the "Defendants") in the cases enumerated in the caption to answer or file a motion in response to the Complaints is hereby extended thirty (30) days up to and including June 12, 2019.

No provision of this Stipulation and Order shall be construed as a waiver of, and Defendants expressly reserve, any and all defenses.

This is the Defendants' first request for an extension of time to answer or otherwise respond to the Complaints.

Dated: May 10, 2019

New York, New York

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SO ORDERED:

Hon. Lewis A. Kaplan United States District Judge